

## DEPARTMENT OF THE ARMY U.S. ARMY CHEMICAL MATERIALS AGENCY 5183 BLACKHAWK ROAD ABERDEEN PROVING GROUND, MARYLAND 21010-5424

## Project Manager for Alternative Technologies and Approaches

(Name) (Address) (City, State Zip Code)

Dear (Salutation Name):

Thank you for your recent letter, which you provided to me on Dec. 17, 2003 at the public meeting held at South Vermillion County High School. We appreciate your interest and endorsement of the need to destroy the nerve agent VX stockpiled at the Newport Chemical Depot, or NECD.

Our mission is to safely dispose of the VX stockpile at Newport. The mission includes the safe disposal of the caustic wastewater that results from destroying the VX through neutralization with a mixture of hot water and caustic.

As I indicated at a series of meetings held on Dec. 17, 2003, with the depot employees, the Citizens' Advisory Committee, and the public, I have concluded that the shipment of the caustic wastewater to a properly permitted commercial treatment, storage, disposal facility for treatment/disposal can be performed safely and without adverse impact to the public and is the right thing to do. The wastewater from Newport is similar to waste routinely transported to and treated at permitted commercial off-site disposal facilities around this nation. Our path forward is consistent with repeated findings and recommendations from the National Research Council committees to utilize operating commercial facilities with a trained and dedicated staff rather than attempting to duplicate this capability on-site at Newport.

The caustic wastewater is not VX and possesses none of the characteristics of VX as demonstrated through actual toxicological testing. The wastewater from neutralization is corrosive as a result of the residual sodium hydroxide left after the VX is destroyed. The residual sodium hydroxide serves to ensure that the caustic wastewater retains its ability to react with VX. Exposure to the wastewater could cause chemical burns to unprotected skin. However, just as sodium hydroxide is transported safely on the nation's highways every day, the caustic wastewater would be handled with appropriate safety precautions and it would be shipped safely in accordance with Department of Transportation regulations for hazardous waste. Safe shipping includes informing and involving appropriate local officials and emergency management agencies along the shipment routes.

The Army will not allow shipment of materials that contain nerve agent. Only after nerve agent destruction is confirmed by laboratory analysis at Newport would the caustic wastewater be shipped for final treatment and disposal.

Although the off-site TSDF will perform its own transportation assessment as part of their contract, the Army contracted the Oak Ridge National Laboratory, Oak Ridge, Tenn., to perform an independent detailed transportation analysis of two possible routes from Newport to DuPont's Secure Environmental Treatment facility in Deepwater, N.J.—a potential treatment facility. The analysis refers to the caustic wastewater as "liquid process effluent" and concludes that, "The U.S. Army's intent to ship the NECDF liquid process effluent to a permitted TSDF does not pose any unique transportation safety concerns or unacceptable environmental impacts relative to those associated with routine commercial and trade

industry hazardous waste shipments. Under hazardous waste regulations, the NECDF process effluent is a hazardous waste due to its corrosive nature, which is similar to that of liquid household drain cleaner. The proposed off-site shipment and transport of process effluent is not likely to produce any significant impacts to human health or to the environment." Copies of the Transportation Assessment may be read or obtained by contacting the Newport Chemical Stockpile Outreach Office, Newport, Ind., (765) 492-4445, toll free 1 (866) 300-9034, Fax: (765) 492-4475.

Any treatment process used to dispose of the caustic wastewater off-site must be proven and reliable. This will be evidenced, prior to any contract being awarded, by treatability studies at disposal facilities that might be selected to destroy the caustic wastewater. Such treatability studies will be made available to the public.

By partnering with a regulated disposal facility, the Newport Chemical Agent Disposal Facility, or NECDF, combines its expertise at destroying the VX with a commercial enterprise that has the proven expertise and facilities to safely destroy the caustic wastewater. This avoids "reinventing the wheel" and maximizes safety and efficiency for the entire disposal process.

Though extensive testing, analyses, and research demonstrates the safety of off-site disposal of the caustic wastewater, public involvement is crucial at Newport, where the VX will be destroyed, and at any site where the caustic wastewater would be disposed. We recently announced we would conduct public information sessions for the area around DuPont's Secure Environmental Treatment facility in New Jersey. Associated with this meeting is a public comment period that totals 90 days. At least 30 days of that period will be after the public meeting in order to allow adequate time for comments. We will also have a public information meeting in the Newport area within the next 60 days to update the public on the status of the Newport Chemical Agent Disposal Facility and on selection of a method to dispose of the caustic wastewater. I hope to see you there.

Until then, if you have additional questions please contact Jeff Lindblad, Public Affairs Officer, U.S. Army Chemical Materials Agency, E4584 Parrish Road, Aberdeen Proving Ground, MD 21010-4005. You may reach Mr. Lindblad at (410) 436-4555 or by fax at (410) 436-5122 or Ms. Terry Arthur, PO Box 260, Newport, IN 47966-0160, at (765) 245-4475.

In summary, we understand each of the concerns listed in your letter and we believe that we have addressed these concerns as we move toward start of operations to destroy VX stored at the NECD.

Sincerely,

Jesse L. Barber Colonel, U.S. Army Project Manager, Alternative Technologies and Approaches

## To the U.S. Army and the Department of Defense:

I am writing to express my deep concern regarding the possible shipment of VX hydrolysate from the Newport Chemical Activity facility near my home. Although I continue to support neutralization of VX and believe the neutralization process can effectively destroy this deadly agent, I nevertheless feel uncertain about the wisdom of transportation of the hydrolysate.

From information I have learned up to this time, my conclusions are:

- Safety must be the primary concern -before schedule and cost.
- Further testing and investigation need to be done on hydrolysate produced here.
- Improved verification methods need to be implemented.
- Treatment of hydrolysate on site should be given serious consideration.
- Public involvement must be a priority.
- Shipping should not occur until/unless <u>all communities</u> along a "carefully planned" route are fully informed and involved, including local emergency personnel as well as SEMA and FEMA groups.
- The public at the receiving site should be fully informed and involved not just a token program.
- Any receiving commercial facility must demonstrate and prove an absolute capability of treating the hydrolysate without damaging the environment – air, water, land. Experimentation should not be part of full-scale operations.
- The process of determination should be open and transparent no spin, no deception, no lapses of attention to detail.

My conclusions are also based on observations of activities surrounding the failed effort to transport VX hydolysate to Permafix in Dayton, Ohio. Because of trust issues and financial issues, the Department of Defense can not afford to be less than honest with the public. Ideally, citizens groups would have meaningful involvement during the decision-making process – as was suggested in October. This suggestion was acceptable to citizens and both contractors; unfortunately the Army/Dept. of Defense turned thumbs down. Citizens have demonstrated through the ACWA process that they are capable of participating in a cooperative venue, of understanding the issues, and of arriving at mutually agreeable solutions. I support a similar process now.

We all have one objective: the destruction of VX. I will continue to support efforts in this direction that are open, safety-oriented, and effective.

Sincerely,